

WI Draft Pollution Control Projects Exclusion



NSR Retooling Team Meeting

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Wisconsin Department of Natural Resources



Pollution Control Project Exclusion

The PCP exclusion allows a project that reduces emissions of one or more air pollutants regulated under the Act to avoid major NSR review despite causing a significant emissions increase in a collateral pollutant.

The exclusion only applies to activities at existing emissions unit; addition of new emissions units does not qualify for the exclusion.



Pollution Control Projects

What qualifies for the Exclusion under rule?

- To qualify for the exclusion, an activity must pass two tests:
 - Environmentally Beneficial Test (shows benefits outweigh emissions increase)
 - Air Quality Test (shows that project will not cause or contribute to a NAAQS or PSD increment violation, or adversely impact a Class I AQRV)



Listed vs. Unlisted Projects

- Listed Projects - No major NSR permit action is required, but a notice must be sent to the Reviewing Authority with information on the project and air quality analysis. Project may proceed upon notice at risk of DNR/EPA disagreement with air quality test or wait 21 days for default concurrence.
- Unlisted Projects - A permitting action, with public notice and comment, is required to show that both tests are satisfied.



Notice requirements

- Description of the project
- Potential emission increase or decreases
- Copy of the environmental beneficial test
 - statement that project is listed is sufficient
- Description of monitoring/record keeping
- Certification that project designed to stds.
- Demonstration PCP will not have adverse environmental impact (modeling, etc.)



Listed Projects

- Flue gas desulfurization or sorbent injection
- Electrostatic precipitators, baghouses, high efficiency multiclones, or scrubbers
- Flue gas recirculation, low-NOX burners or combustors, selective noncatalytic reduction, selective catalytic reduction, low emission combustion (for IC engines), and oxidation/absorption catalyst
- Regenerative thermal oxidizers, catalytic oxidizers, condensers, thermal incinerators, hydrocarbon combustion flares, biofiltration, absorbers and adsorbers, and floating roofs
- Activities or projects undertaken to accommodate switching (or partially switching) to an inherently less polluting fuel (limited list of activities)
- Activities or projects undertaken to accommodate switching from the use of one ozone depleting substance to the use of a substance with a lower or zero ozone depletion potential (determination method provided)



Emission Reduction Credits and Pollution Control Projects

- Similar approach to as that of Clean Units
- ERC surplus if beyond PCP levels and made enforceable through permitting process - if other pollutant increase significant NSR would apply
- ERC not surplus if PCP extended to account for additional reduction and meets PCP tests.